

# **EXHIBIT D**

**JOHN  
RANZ'S  
DEPOSITION  
EXCERPTS  
11/11/03**

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

Q&R ASSOCIATES, INC.,  
Plaintiff,  
vs.  
UNIFI TECHNICAL FABRICS, LLC,  
ET AL.,  
Defendants.

CONFIDENTIAL  
CASE NO. C-1-01-641

DEPONENT: JOHN RANZ, JR.

NOVEMBER 11, 2003

10:16 A.M.

REPORTED BY:  
Heidi L. Constable, RPR, RMR

1           A.       Mike had told me that he had further  
2       conversations with Mike Mebane and that Mebane had  
3       invited us to come down to Mocksville to look around,  
4       no obligation on anybody's part, just kind of get to  
5       know one another and look around.

6           Q.       Okay. And what was your response to  
7       that?

8           A.       Based on what we had been told as  
9       far as the capabilities, the new Reifenhauser  
10      equipment, I had some interest.

11          Q.       Why did you have interest then and no  
12      interest in the first contact between Mr. Quinn and  
13      Mr. Mebane?

14          A.       You know, first of all, during the  
15      first contact, to the best of my knowledge, UTF  
16      hadn't even broken ground yet, so it was still a  
17      speculative venture, if you will. In January of '01  
18      the situations were changing, we had the situation  
19      with Drypers being purchased by AHP, I personally was  
20      concerned about the growth opportunities for Q&R with  
21      the spunbond product line and always looking to grow  
22      our business. I thought if nothing else, it wouldn't  
23      hurt to sit down, you know, I'll listen to anybody at  
24      any point in time.

1 discussed what the plans were for the next day, Mr.  
2 Mebane said, At this point in time I would like to  
3 request that the fact that you two have come down  
4 here to visit and that we've had this meeting, I  
5 would like to request that we keep this meeting --  
6 the fact that this meeting took place confidential  
7 amongst the three of us. And Mike and I both  
8 responded that we have no problem with that. And at  
9 that point Mr. Mebane stood up and we all shook hands  
10 and he cheerfully said, We call this a North Carolina  
11 agreement.

12 Q. And that was a North Carolina  
13 agreement that you keep your meeting secret?

14 A. My impression of what he was terming a  
15 North Carolina agreement was, yes, we keep this  
16 meeting secret, yes, everything that we discussed at  
17 this meeting is secret, and that here in North  
18 Carolina our word is our bond, and that's what we  
19 call a North Carolina agreement. So if I tell you  
20 something, you can take it to the bank and you can  
21 trust it to be truthful. That's what I considered to  
22 be the North Carolina agreement.

23 Q. The sequence of events was he asked  
24 you to keep the meeting secret, you and Mr. Quinn